

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

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|--------------------------------------|---|----------------------------------|
| NAVY SEALS 1-3, et al. |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | Civil Action No. 4:21-cv-01236-O |
| |) | |
| LLOYD J. AUSTIN III, in his official |) | |
| capacity as United States |) | |
| Secretary of Defense, et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |

JOINT REPORT

On March 11, 2024, the Court issued an order requiring the parties to submit a joint mediation report that informs the Court whether this case has been settled by agreement of the parties. ECF No. 268. The parties attended mediation with Magistrate Judge Cureton on April 3, 2024 and have had additional conversations both with Judge Cureton and amongst themselves since then. On April 10, 2024, the Court granted a two-week stay to permit the parties to continue these discussions. ECF No. 273. On April 25, 2024, the Court granted a further one-week stay to permit the parties to continue negotiations. ECF No. 275.

The parties have now reached an agreement in principle on terms that will be memorialized in a Proposed Settlement Agreement which, subject to formal final approval by the Department of Justice, will be filed for the Court's review and preliminary approval. Counsel are currently working on drafting the Proposed Settlement Agreement, the content of class notices, and a motion for preliminary approval of the Class Settlement. Thus, the parties respectfully request that the Court vacate the discovery deadlines and extend the stay for 30 days to allow for these tasks to be completed and for the required government approval of the Proposed Settlement Agreement

(which Defendants' counsel estimates will take two weeks). The parties propose that by the end of the 30-day stay, they will either file the appropriate motion and proposed agreement, or the parties will file another joint status report informing the Court of the status of these tasks and including an explanation for any delay.

Dated: May 1, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on May 1, 2024, this document was served through the Court's CM/ECF Document Filing System upon all counsel of record.

/s/ Heather Gebelin Hacker
HEATHER GEBELIN HACKER